

STATEMENT OF BASIS

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0061191
to discharge to waters of the State of Louisiana.

AI No.: 51730 / Activity No.: PER20070001

THE APPLICANT IS: Sewerage and Water Board of New Orleans
900 Lamarque Street
New Orleans, LA 70114

Facility

Algiers Water Plant
900 Lamarque Street
New Orleans, Orleans Parish

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Bonnie Wascom

DATE PREPARED: March 13, 2008

1. PERMIT STATUS

- A. LPDES permit – LA0061191
LPDES permit effective date: October 1, 2002
LPDES permit expiration date: September 30, 2007
- B. LWDPS permit – NA
LWDPS permit effective date: NA
LWDPS permit expiration date: NA
- C. Date Application Received: November 30, 2007

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY – potable water treatment plant

This is an existing facility, which treats and distributes water from the Mississippi River. Raw water is pumped from the Mississippi River to the Algiers Water Plant. Ferric sulfate and powdered activated carbon are added to the raw water before entering the clarifiers. While in the clarifiers Polyelectrolyte Coagulant, fluoride, lime, chlorine and ammonia are added. The water is blended with sodium hexametaphosphate as it exits the clarifiers and enters the sand filters. From the filters the water is collected in a storage tank until it is distributed for consumption.

The sanitary wastewater from this facility is collected and treated by the city sewage treatment plant.

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B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: I
3. Wastewater Type: III
4. SIC code: 4941

C. LOCATION - 900 Lamarque Street

New Orleans, Orleans Parish

Latitude +29° 56' 36", Longitude -90° 02' 43"

3. OUTFALL INFORMATION

Outfall 001

Discharge Type: Clarifier Underflow

Treatment: None

Location: at the point of discharge from the sludge pit prior to mixing with other waters

Flow: 0.037 MGD

Discharge Route: by pipe to Mississippi River Mile 93.4

Outfall 003

Discharge Type: Filter Backwash Wastewater

Treatment: None

Location: at the point of discharge from the backwash recycle basin prior to mixing with
waters in the detention pond

Flow: 0.236 MGD

Discharge Route: by pipe to Mississippi River Mile 93.4

NOTE: This facility does not require storm water permit coverage because it does not discharge regulated storm water. The facility's SIC code, 4941, is not listed in the storm water regulations at LAC 33:IX.2341.B.14.a-k and therefore the storm water runoff from the site is not classified as regulated industrial storm water.

4. RECEIVING WATERS

STREAM – Outfall 001 & 003 – by pipe to Mississippi River Mile 93.4

BASIN AND SEGMENT – Mississippi River – Subsegment 070301

DESIGNATED USES -

- a. Primary contact recreation
- b. Secondary contact recreation
- c. Propagation of fish and wildlife
- d. Drinking water supply

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5. EXISTING EFFLUENT LIMITS

1. Outfall 001 – Clarifier underflow

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg: Daily Max (mg/l)	<u>Monitoring</u>
Flow (GPD)	-----: Report	Monthly
Coagulants	Report: Report	Monthly
pH	7.0 - 11.0 su	Monthly

2. Outfall 003 – Filter backwash wastewater

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg: Daily Max (mg/l)	<u>Monitoring</u>
Flow (GPD)	-----: Report	Monthly
Coagulants	Report: Report	Monthly
pH	7.0 - 11.0 su	Monthly

6. PROPOSED EFFLUENT LIMITS

BASIS – See rationale below.

7. COMPLIANCE HISTORY/COMMENTS

A. Compliance History

There are no open, appealed, or pending OES enforcement actions as of **January 1, 2005**. There is no EPA enforcement history on file as of **January 1, 2005**.

B. DMR Review/Excursions

72 DMRs were reviewed for the period of January 2005- December 2007. The review revealed 4 exceedances for the pH parameter at Outfall 003.

8. ENDANGERED SPECIES

The receiving waterbody, Subsegment 070301 of the *Mississippi River* Basin, has been identified by the U.S. Fish and Wildlife Service (FWS) as habitat for the *Pallid Sturgeon* species, which is listed federally as a threatened species. However, this type of discharge is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated October 24, 2007 from Boggs to Brown. Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as

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aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

9. 303 (d) LISTED WATERBODIES

Subsegment 070301, Mississippi River – From Monte Sano Bayou to Head of Passes, is not listed on LDEQ's Final 2004 303(d) List as impaired, and to date no TMDL's have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.

10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation
Office of Environmental Services Public Notice Mailing List

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Rationale for Water Treatment Plant

1. Outfall 001 – Clarifier underflow

<u>Pollutant</u>	<u>Limitation</u>	<u>Reference</u>
	Mo. Avg: Daily Max	
Flow (GPD)	Report: Report	LAC 33:IX.2361.I.1.b
Clarifying Agents Used	Report: Report	Similar discharges (BPJ)
pH	7.0 - 11.0 su	Prior Permit** (BPJ)
Treatment: None		

***Monitoring Frequency:** Once per month for flow, coagulants, and pH at the point of discharge from the clarifier sludge pit prior to mixing with other waters.

2. Outfall 003 – Filter backwash wastewater

<u>Pollutant</u>	<u>Limitation</u>	<u>Reference</u>
	Mo. Avg: Daily Max	
Flow (GPD)	Report: Report	LAC 33:IX.2361.I.1.b
Clarifying Agents Used	Report: Report	Similar discharges (BPJ)
pH	7.0 - 11.0 su	Prior Permit** (BPJ)
Treatment: None		

***Monitoring Frequency:** Once per month for flow, coagulants, and pH at the point of discharge from the backwash recycle basin prior to mixing with other waters.

****Limits Justification:** For all parameters except pH, limits and monitoring frequencies are based on the general permit for potable water treatment plants (LAG380000) effective on January 1, 2005, raw water from surface water sources and on the previous permit. The limitations for pH are based on the prior permits for the facility effective on December 10, 1981, and October 1, 2002.

Note: The Potable Water Treatment Plant General Permit is not appropriate for this facility because the facility's treatment protocols and processes warrant continuation of the pH limit established in the permits issued by EPA in 1981 and by LDEQ in 2002.

BPJ Best Professional Judgment
GPD Gallons per Day
su Standard Units

NOTE:

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

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Storm Water Pollution Prevention Plan (SWP3) Requirement

Discharges from this facility are not classified as industrial storm water per LAC 33:IX.2341.B.14. Therefore, the Storm Water Pollution Prevention Plan (SWP3) requirement is not included in this permit.

However, per LAC 33:IX.903.B, all above ground storage tanks with a capacity of 660 gallons for an individual container or 1320 for multiple containers, must have secondary containment and a Spill Prevention and Control Plan.